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March 31, 2014

BY ECF

Honorable Raymond J. Dearie
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bebars Baslan
Docket No. 13 CR 220 (RJD)

Dear Judge Dearie:

Due to unforeseen additional case law discoveries, that spawned additional arguments in our motion papers, we respectfully request an additional day, until tomorrow, April 1st, to file defendant Baslan's pretrial motions. This will put us on par with the required filing schedule for co-defendant Kristin Henry.

I thank Your Honor for your courtesy and consideration.

Respectfully Submitted,

Ephraim Savitt

cc: All counsel
By ECF and E-mail